

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 0:23-CV-81150-RLR

ANDREW TATE & TRISTAN TATE,

Plaintiffs

vs.

[REDACTED], et al.,

Defendants.

_____ /

**DECLARATION OF DANI PINTER
IN SUPPORT OF DEFENDANTS' MOTION FOR PSEUDONYMITY AND MOTION
FOR PARTIAL SEAL AND PROTECTIVE ORDER**

I, Dani Pinter, do hereby state as follows:

1. My name is Dani Pinter and I am counsel of record for the Defendants in this matter.
2. On July 19, 2023, at approximately 3pm, I became aware of a tweet by attorney for the Plaintiffs', Mr. Joseph McBride, which invited the public to view [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

3. The tweet was located at:

<https://twitter.com/McBrideLawNYC> [REDACTED]

4. The tweet included a link to Google Drive.
5. I clicked the Google Drive link and it brought me to a Google Drive file which contained the [REDACTED]

6. On the third page of [REDACTED] [REDACTED], which was available on the Google Drive file published on Twitter, was a portion of [REDACTED] official witness

statement to the Romanian prosecutor and contained her passport number, her date of birth, her place of birth, her parents' names, her parents' address, and her phone number.

7. On the tenth page of [REDACTED] which was available on the Google Drive file published on Twitter, was the [REDACTED] for [REDACTED] which contained her parents' names, her date of birth, her place of birth, her home address, and her [REDACTED] ID number.

8. I became immediately concerned for the safety and security of my clients and reported the release of private information to Twitter and to law enforcement. I also sent Mr. McBride a direct message on Twitter.

9. By 7pm the tweet Mr. McBride shared containing the personal and private information of [REDACTED] had been viewed over 13,000 times. I found Mr. McBride's email address and sent him an email at 7:30pm requesting that the information be taken down. Around 8:30pm, Mr. McBride responded to my email and removed [REDACTED] from the Google Drive link.

10. In my email request to Mr. McBride made on July 19th, I requested that in addition to removing the information from Twitter, that the private information be redacted from public view [REDACTED] For this reason, and due to the ongoing harassment of the Defendants, Defendants are seeking redaction and/or sealing of those documents and others, and for a protective order to govern personal and private information throughout the duration of this case, and after, via the instant motion.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 8th day of September, 2023.

Dani Pinter

Dani Pinter